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May 21, 1993

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VIA HAND DELIVERY

Ms. Donna R. Searcy
Secretary
Federal Communications Communication
1919 M Street, N.W. - Room 222
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Oral Ex Parte Presentation Made in PR Docket
No. 92-235


Dear Ms. Searcy:

Pursuant to the requirements of Section 1.1206(a)(2) of the Commission's Rules and Regulations, enclosed please find an original and one (1) copy of the outline of an oral Ex Parte presentation made today on behalf of the Montana Power Company by the undersigned to the Chief of the Private Radio Bureau. This presentation addressed the Commission's proposals concerning the refarming of private land mobile radio spectrum in the frequency bands below 512 MHz as set forth in the Notice of Proposed Rule Making in the above-referenced docketed proceeding.

A copy of the outline of this oral Ex Parte presentation has already been furnished to Mr. Ralph A. Haller, Chief of the Bureau.

Kindly direct to the undersigned any questions you may have concerning this presentation.

Very truly yours,


Carole C. Harris

Enclosure

cc: Mr. Ralph A. Haller

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PR DOCKET NO. 92-235

REAPPLYING THE PRIVATE LAND MOBILE RADIO FREQUENCY FEDERAL COMMUNICATIONS COMMISSION

C. Total cost impact of Refarming proposal approximately \$3,099,000.

D. Exclusive Use Overlay: Imposing a loading requirement on applicants/licensees such as MPC in rural areas may not be necessary; lack of congestion.

III. Solutions: Short of exempting Montana Power and entities serving similarly situated rural areas from the Refarming concept, MPC could support the LMCC Consensus Plan as a workable alternative. Permit rural area applicants/licensees to take advantage of the Exclusive Use Overlay without having to meet the 20% loading standard.

Implementation of LMCC Consensus Plan is workable alternative. "Plan A" gradual approach to 150 MHz band equipment is preferred. Providing applicants/licensees the "Safe Harbor" ERP/HAAT permissible combinations Table based on service area requirements is reasonable. MPC notes that LMCC "Safe Harbor" plan would permit entities requiring height/power combinations in excess of the table value to submit coverage contours showing that power requested correlates to the need to cover required service area.